To: Russ, Timothy[Russ.Tim@epa.gov]; Patulski, Meg[patulski.meg@epa.gov]; Dubey,

Susmita[dubey.susmita@epa.gov]

Cc: Dresser, Chris[Dresser.Chris@epa.gov]; Anderson, Carol[Anderson.Carol@epa.gov]; Jackson,

Scott[Jackson.Scott@epa.gov]; Denawa, Mai[Denawa.Mai@epa.gov]; Odendahl,

Steve[Odendahl.Steve@epa.gov]

From: Berry, Laura

Sent: Fri 11/4/2016 7:53:34 PM

Subject: RE: Followup Questions from last week's IAC meeting - FHWA's Responses

<u>annual 08 031 0026 2013.csv</u> <u>annual 08 031 0026 2014.csv</u> <u>annual 08 031 0026 2015.csv</u>

Hi Tim,

Just want to confirm that the info you are suggesting we review is all within the email below, right? That is, there's no other document(s) that we should be looking at, other than the data from the La Casa monitor? If that's the case, then I'd say please go ahead and set up the conference call.

I pulled down data for La Casa from EPA's air data webpage, attached – note, the only change I made to these spreadsheets was to sort the sheet based on column K "pollutant standard." If you want the original downloads, go to:

https://www.epa.gov/outdoor-air-quality-data/interactive-map-air-quality-monitors and then launch the map app, zoom in on Denver, and click on the La Casa monitor.

Laura Berry

(734) 214-4858

berry.laura@epa.gov

From: Russ, Timothy

Sent: Friday, November 04, 2016 1:35 PM

To: Patulski, Meg <patulski.meg@epa.gov>; Berry, Laura <berry.laura@epa.gov>; Dubey,

Susmita <dubey.susmita@epa.gov>

Cc: Dresser, Chris Dresser, Chris@epa.gov; Anderson, Carol Anderson, Carol@epa.gov; Jackson, Scott Jackson, Scott Denawa, Mai Denawa.Mai@epa.gov; Odendahl,

Steve <Odendahl.Steve@epa.gov>

Subject: FW: Followup Questions from last week's IAC meeting - FHWA's Responses

Ex. 5 - Deliberative Process

The new monitoring site that was recommended for use by the Colorado Department of Environmental Quality (CDPHE), Air Pollution Control Division (APCD), is called La Casa. As FHWA notes below, it is located just west of the I-25 / 1-70 interchange at the western boundary of the project; the coordinates and monitoring parameters are:

La Casa (CASA)

Region: Denver Monitoring Station 4545 Navajo Street

SAROAD:

AQS ID: 080310026 Latitude: 39.779460 Longitude: -105.005124 Reporting capabilities (hourly) SLAMS: CO, PM10, PM2.5

NAMS: 03, S02

SPM: NO, RD, RS, TEMP, WD, WS

Please let me know if you any questions and thanks for your continuing assistance on this project.

Tim

Tim Russ Environmental Scientist USEPA Region 8 Air Program 1595 Wynkoop Street (8P-AR) Denver, CO 80202-1129 Ph. (303) 312-6479

Ph. (303) 312-6479 Fax (303) 312-6064

e-mail: russ.tim@epa.gov

From: Houk, Jeff (FHWA) [mailto:Jeff.Houk@dot.gov]

Sent: Wednesday, November 02, 2016 2:59 PM

To: Russ, Timothy < <u>Russ. Tim@epa.gov</u>>

Cc: Dresser, Chris < <u>Dresser.Chris@epa.gov</u>>; Anderson, Carol < <u>Anderson.Carol@epa.gov</u>>;

Horn, Chris (FHWA) < Chris. Horn@dot.gov >; Henderson - CDOT, Vanessa

(vanessa.henderson@state.co.us) < vanessa.henderson@state.co.us>

Subject: Followup Questions from last week's IAC meeting

Referred to FHWA

Ex. 5 - Deliberative Process

From: Russ, Timothy [mailto:Russ.Tim@epa.gov]
Sent: Thursday, October 27, 2016 9:33 AM

To: Houk, Jeff (FHWA)

Cc: Dresser, Chris; Anderson, Carol

Subject: Conclusion of the PM10 conformity consultation: FHWA/EPA-R9 South Mountain Freeway

project + Additional Questions

Hi Jeff,

Thanks for forwarding the below email from Region 9. We had a couple of other questions regarding the information that FHWA presented at Tuesday's (10/25/16) Cooperating Agencies meeting and would appreciate additional information that we will want to share within Region 8 and OTAQ.

1.) The attached email from Region 9, regarding the PM₁₀ conformity consultation for the South Mountain Freeway project near Phoenix, AZ, addressed comments and FHWA responses on the Draft EIS for the project. Did Region 9 provide additional comments and/or conformity consultation on the Final EIS?

Referred to FHWA

U.S. EPA DETAILED COMMENTS ON THE FINAL ENVIRONMENTAL IMPACT STATEMENT FOR THE SOUTH MOUNTAIN FREEWAY PROJECT, MARICOPA COUNTY, ARIZONA, DECEMBER 22, 2014

Air Quality

Transportation Conformity

Since completing our review of the Draft EIS for the South Mountain Freeway project in July 2013, EPA has been working closely with FHWA to address project-level Transportation Conformity requirements, including the need to analyze the "worst-case intersection" with the highest total PM10 concentrations. Both Chapter 4 of the Final EIS and the Air Quality Technical report describe the worst-case intersection, where the new roadway would connect to I-10 west of Phoenix, as being analyzed for the purposes of conformity requirements, while both the 40th Street and Broadway Road intersections are characterized as being analyzed for NEPA purposes only. However, the results of the Transportation Conformity analysis demonstrate that the 40th Street Interchange is the location with the highest total PM10 concentrations. EPA's PM10 hot-spot guidance states, "it may be appropriate in some cases to focus... on the locations of highest air quality concentrations," and thus it is important that the 40th Street interchange also be characterized as being analyzed for conformity purposes. EPA recommends that this be clarified in the Record of Decision (ROD).

Ex. 5 - Deliberative Process

Referred to FHWA

Ex. 5 - Deliberative Process

"To estimate emissions from the highway segment nearest the neighborhoods where pollution levels are expected to be the worst, COOT omitted half of expected truck emissions by using the region wide truck share (4.9%) of VMT rather than the actual truck counts on 1-70 (9.8%) reported on CDOT's website. Does the EPA rule require that emissions from actual traffic on the interstate be modeled?"

We responded to this question in out letter of 6/22/16, which CDOT and FHWA received a copy, and noted:

"B.) Question #3 regarding truck emissions:

The EPA's transportation conformity regulation requires that estimated pollutant concentrations must be based on the total emission burden which may result from the project and future background concentrations (40 CFR 93.123©(I)). The EPA's guidance for modeling emissions from highways is that local traffic data should be used to characterize each link sufficiently. As we noted above, an updated hotspot analysis is being developed for 2040 by CDOT/FHWA, and the EPA will be reviewing the percentage of trucks used for the analysis."

Ex. 5 - Deliberative Process

Thanks!

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air Program
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Ph. (303) 312-6479
Fax (303) 312-6064

e-mail: russ.tim@epa.gov

From: Houk, Jeff (FHWA) [mailto:Jeff.Houk@dot.gov]

Sent: Tuesday, October 25, 2016 2:39 PM

To: Russ, Timothy <Russ.Tim@epa.gov>; Anderson, Carol <Anderson.Carol@epa.gov>

Subject: FW: Conclusion of the PM10 conformity consultation between FHWA and EPA for the

South Mountain Freeway project

Referred to FHWA

From: meek, clifton [mailto:meek.clifton@epa.gov]

Sent: Thursday, August 21, 2014 5:50 PM

To: Yedlin, Rebecca (FHWA)

Cc: Hansen, Alan (FHWA); Houk, Jeff (FHWA); Dunning, Connell

Subject: Conclusion of the PM10 conformity consultation between FHWA and EPA for the South

Mountain Freeway project Hi Rebecca-I spoke with Alan Hansen this morning regarding the additional air quality comments EPA had sent on both 8/19 and 8/6, and he confirmed that all of the comments are being addressed by FHWA, and the Air Quality Technical Report revised accordingly. With that information, this concludes the PM10 conformity consultation between FHWA and EPA for the South Mountain Freeway project. We'd like to thank FHWA for working so closely with EPA to address our concerns, and we look forward to reviewing and providing comments on the Final EIS when it is circulated for review. Please see the attached spreadsheet for a summary of the consultation (comments and responses) that has taken place between EPA and FHWA since we received the Air Quality Technical Report on 6/2/2014. If you have any questions or notice any revisions that should be made to the summary, please let me know. Thanks, Clifton Clifton Meek, Life Scientist U.S. EPA, Region 9 Environmental Review Section - Transportation Team 75 Hawthorne Street, ENF 4-2 San Francisco, CA 94105

phone: 415-972-3370, fax: 415-947-8026

meek.clifton@epa.gov